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13 **RUTH APPLE**

14 **UNITED STATES DISTRICT COURT**
15 **DISTRICT OF NEVADA**

16 **RUTH APPLE,**
17 Plaintiff,
18
19 vs.
20 **CSAA GENERAL INSURANCE COMPANY**
21 **dba AAA INSURANCE; CSAA INSURANCE**
22 **EXCHANGE dba AAA INSURANCE; and**
23 **MARIBEL LEYVA,**
24 Defendants.

Case No.: 2:19-cv-01093-RFB-DJA

**STIPULATION AND PROPOSED ORDER TO
RESCHEDULE HEARING ON [9] DEFENDANT'S FIRST
MOTION TO DISMISS re: [1] PETITION FOR
REMOVAL AND [10] SECOND MOTION TO DISMISS
re [1] PETITION FOR REMOVAL SET**

(FIRST REQUEST)

25 Pursuant to LR 6-1, 6-2, 7-1, and 26-4, Plaintiff Ruth Apple ("Plaintiff" or "Apple"), by and
26 through her attorneys of records, Joseph N. Mott and Scott E. Lundy of Rempfer Mott Lundy,
27 PLLC, and Defendant CSAA General Insurance Company dba AAA Insurance and CSAA Insurance
Exchange dba AAA Insurance, by and through its attorneys of record, Jonathan Carlson of
McCormic, Barstow, Sheppard, Wayte & Carruth, LLP, hereby stipulate and agree to re-schedule
[9] First Motion to Dismiss re [1] Peition for Removal and [10] Second Motion to Dismiss re: [1]
Peition for Removal currently set for March 10, 2020. This is the parties' first request for such a
continuance.

1 This stipulation to continue the hearing date is based on Plaintiff's recent change of
2 counsel and the need for new counsel to prepare for the subject hearing.

3 Based on the foregoing, the Parties respectively request the Court continue the hearing
4 date 14 days or as close thereto as the Court as calendar will allow.

5 Dated this 9th day of March, 2020.

6
7 REMPFER MOTT LUNDY, PLLC

McCORMICK, BARSTOW, SHEPPARD,
WAYTE & CARRUTH, LLP

8 /s/ Joseph N. Mott

9 /s/ Jonathan Carlson

10 Joseph N. Mott

Jonathan Carlson

11 Nevada Bar No. 12455

Nevada Bar No. 10536

12 Scott E. Lundy

Attorneys for Defendants

13 Nevada Bar No. 14235

**CSAA General Insurance Company and
CSAA Insurance Exchange**

Attorneys for Plaintiff

Ruth Apple

14 **ORDER**

15 IT IS SO ORDERED that the hearing set for March 10, 2020 at 10:00 AM is vacated and reset for
16 March 17, 2020 at 11:00 AM in LV Courtroom 7C.

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18 Dated: March 9, 2020.

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20 RICHARD F. BOULWARE, II
21 UNITED STATES DISTRICT JUDGE
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